

1 Marc Pilotin  
2 Regional Solicitor  
3 Boris Orlov, Attorney  
(California State Bar Number 223532)  
4 Charles C. Song, Attorney  
(California State Bar Number 204497)  
5 Office of the Solicitor  
United States Department of Labor  
312 North Spring Street, Suite 720  
Los Angeles, California 90012  
6 Telephone: (213) 894-5365  
Email: song.charles.c@dol.gov

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8 Attorneys for the Plaintiff

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11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN MARIANA ISLANDS

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25 Julie Su, ) Case No. CV 19-00007  
Acting Secretary of Labor, )  
United States Department of Labor, )  
Plaintiff, ) **NOTICE OF AUTHORIZATION OF**  
v. ) **RECEIVER TO EXERCISE ALL**  
Imperial Pacific International Holdings, Ltd., ) **POWERS UNDER THE ORDER**  
Imperial Pacific International (CNMI), LLC ) **APPOINTING RECEIVER AND**  
Defendants. ) **SETTING TERMS OF RECEIVERSHIP**  
 ) **TO SELL LOT 463 PARCELS**  
 )  
Plaintiff, Julie Su, Acting Secretary of Labor, United States Department of Labor (the  
"Acting Secretary"), hereby gives notice that Defendants Imperial Pacific International Holdings,  
Ltd, Imperial Pacific International (CNMI), LLC, (collectively IPI) have failed to cure default  
within ten (10) business days of the filing of the Secretary's Notice of Failure to Cure Default  
[ECF 93] and the Receiver is authorized and will proceed to exercise all powers under the Order  
Appointing Receiver and Setting Terms of Receivership [ECF 50], to sell the "Lot 463 Parcels"  
identified in Exhibit A of the Second Amended Judgment [ECF 91], to pay the full gross  
**NOTICE OF AUTHORIZATION OF RECEIVER**

1 amount outstanding (**\$797,719.73**) plus the Receiver's costs and fees.

2 Under the terms of this Court's Judgment [ECF 2, ECF 60, and ECF 91], IPI's failure to  
 3 make timely payments beginning on August 1, 2023, constituted an event of default. Pursuant to  
 4 these terms, the Secretary filed a Notice of Default [ECF 92] on September 4, 2023, and served it  
 5 on Defendants. As a result of IPI's default, the full gross amount outstanding and due under this  
 6 Consent Judgment as amended became immediately due to the U.S. Department of Labor.  
 7 Although Defendants were making periodic payments, they never cured the default and filed a  
 8 Chapter 11 bankruptcy petition, # 1:24-bk-00002, on April 19, 2024. On July 24, 2024, the  
 9 Court granted the parties' stipulation to vacate the automatic stay with respect to IPI in  
 10 connection with the instant matter. *See* Dkt. 176, # 1:24-bk-00002. On August 31, 2024, the  
 11 Secretary filed a Notice of Failure to Cure Default [ECF 93] and served it on Defendants. As  
 12 Defendants have failed to cure default within ten (10) business days of the filing of the  
 13 Secretary's Notice of Failure to Cure Default, the Receiver is authorized and will proceed to  
 14 exercise all powers under the Order Appointing Receiver and Setting Terms of Receivership  
 15 [ECF 50], to sell the "Lot 463 Parcels" identified in Exhibit A of the Second Amended Judgment  
 16 [ECF 91], to pay the full gross amount outstanding (**\$797,719.73**) plus the Receiver's costs and  
 17 fees.

18 SEEMA NANDA  
 19 Solicitor of Labor

20 MARC PILOTIN  
 21 Regional Solicitor

22 Boris Orlov  
 23 Wage & Hour Counsel

24 /s/Charles Song 10/22/24  
 25 CHARLES SONG, Senior Trial Attorney  
 26 Attorneys for the Plaintiff  
 27 U.S. Department of Labor

28 **NOTICE OF AUTHORIZATION OF RECEIVER**

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the Solicitor, U.S. Department of Labor, at Los Angeles, California, and is a person of such age and discretion as to be competent to serve papers.

That on October 22, 2024, he caused a copy of the Secretary's NOTICE OF AUTHORIZATION OF RECEIVER TO EXERCISE ALL POWERS UNDER THE ORDER APPOINTING RECEIVER AND SETTING TERMS OF RECEIVERSHIP TO SELL LOT 463 PARCELS and this Certificate of Service to be served on Defendants by emailing to the addresses stated below:

Howyo Chi  
Director of HR Operations  
Imperial Pacific International  
howyodoing@gmail.com  
[moxiang2021@gmail.com](mailto:moxiang2021@gmail.com)

Chuck C. Choi, Esq.  
CHOI & ITO  
700 Bishop Street, Suite 1107  
Honolulu, Hawaii 96813  
Ph.: (808) 533-1877 ext. 1  
email: [ccchoi@hibklaw.com](mailto:ccchoi@hibklaw.com)

/s/Charles Song  
Charles Song  
**U.S. DEPARTMENT OF LABOR**

## NOTICE OF AUTHORIZATION OF RECEIVER